

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF PACIFIC
INVESTMENT MANAGEMENT
COMPANY LLC AND ANCHORAGE
CAPITAL GROUP, L.L.C. FOR AN
ORDER TO TAKE DISCOVERY FOR USE
IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

Case No. 18 Misc. _____

***EX PARTE* APPLICATION AND PETITION FOR AN ORDER TO CONDUCT
DISCOVERY FOR USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782**

Petitioners Pacific Investment Management Company LLC and Anchorage Capital Group, L.L.C. (“Petitioners”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully apply to this Court for an order in the form attached as Exhibit 1 to the Declaration of Peter Calamari (the “Calamari Declaration”) authorizing Petitioners to obtain certain limited discovery for use in pending proceedings before the General Court of the European Union and the Spanish Central Criminal Court in the form of the subpoenas attached as Exhibit 2 to the Calamari Declaration. In support of their application and petition, Petitioners submit a Memorandum of Law and attach the Declaration of Peter Calamari dated April 2, 2018, the Declaration of Trevor Soames, dated April 2, 2018, and the Declaration of Ernesto Díaz-Bastien dated March 16, 2018.

Dated: New York, NY

April 3, 2018

Respectfully submitted,

/s/ Peter Calamari

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